UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PIERRE LAGRANGE and G&S TRUSTEES LIMITED,

Plaintiffs,

-against-

11-CV-8757 (PGG) <u>ECF CASE</u>

KNOEDLER GALLERY, LLC d/b/a, KNOEDLER & COMPANY, and ANN FREEDMAN

Defendants.

DECLARATION OF LUKE NIKAS IN SUPPORT OF DEFENDANT ANN FREEDMAN'S MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT

LUKE NIKAS declares as follows pursuant to 28 U.S.C. § 1746:

- 1. I am an associate in the law firm Boies, Schiller & Flexner LLP, attorneys for Defendant Ann Freedman in the above-captioned matter. I make this declaration in support of Freedman's motion to dismiss.
- 1. Attached hereto as Exhibit A is a true and correct copy of the transcript of the proceeding before this Court from December 12, 2011, in the above-captioned matter.
- 2. Attached hereto as Exhibit B is a true and correct copy of the transcript of the proceeding before this Court from December 14, 2011, in the above-captioned matter.
- 3. Attached hereto as Exhibit C is a true and correct copy of the transcript of the proceeding before this Court from December 15, 2011, in the above-captioned matter.
- 4. Attached hereto as Exhibit D is a true and correct copy of the transcript of the proceeding before this Court from December 16, 2011, in the above-captioned matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of May, 2012, at Albany, New York.

Luke Nikas

CERTIFICATE OF SERVICE

I hereby certify that the following counsel of record were served by email on May 14, 2012.

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Luke Nikas